



This document outlines Action for Children's Responses to the Department for Education's consultation on the "Stable Homes, Built on Love" implementation strategy, which followed the recommendations of the Independent Review of Children's Social Care. The consultation was hosted online, and this response was submitted on the 10/05/2023.

7. Overall, to what extent do you agree these six pillars are the right ones on which to base our reforms for children's social care?

Strongly agree.

8. What more can be done by government, local authorities, and service providers to make sure that disabled children and young people can access the right types of help and support?

We know from our services that families describe immense challenges in navigating the support system for their disabled children, and getting the help their children are entitled to. As was highlighted by the recent Child Safeguarding Practice Review Panel investigation into the Doncaster Hesley Group homes, in the worst cases, the lack of community support is leaving children needlessly entering residential care. For many children, their disability overlaps and interacts with serious mental health conditions. We see from the solo placement services Action for Children provides that there are many children in semi-secure hospital placement that are assessed as ready for discharge and would be better off being looked after in a 'home' in the community, but only provided that the adequate support is available. The new family help model offers a promising opportunity to ensure that specialist SEND and appropriate mental health support is made available through family help teams. This could look like designated family support workers with specialist knowledge of SEND issues to help families navigate the support that is available to them, and advocate on their behalf, and to provide ongoing support for children living in foster and residential settings.

We are also pleased to see the government announce additional support for short breaks services through the innovation fund. Residential and community short breaks services provide invaluable opportunities for disabled children to get support, play and socialise with other children, and for families to get some respite from their caring responsibilities. However, these services experienced a 50% decline in real terms funding per EHCP between 2014 and 2020 and are in many cases struggling to meet the complex needs of children. As a provider, we are seeing local authorities reissue commissions at the same face value as contracts issued more than half a decade ago, meaning that important services like youth and activity groups are being cut as it is no longer possible to deliver them whilst keeping the lights on. At the next Spending Review, we would like to see government restore funding for residential and community short breaks services to at least 2014 levels.

More generally, support for children with SEND is a good illustration of how social care services rely on a range of specialist services to operate effectively. Insight from our family support services shows that too many parents struggle to get the support they need for their disabled children. That has a knock-on effect on demand on children's social care services.



9. To what extent are you supportive of the proposal for a system that brings together targeted early help and child in need into a single Family Help Service in local areas?

Somewhat supportive.

There is broad support across our organisation for the new family help model. We think it has great potential to reduce harmful handovers, to harness the expertise of professionals outside of social work, and to enable more children and families to access seamless specialist support. We are pleased that the government is exploring ways to increase the amount of early support to families, although the ambition is somewhat scaled back from that of the Independent Review of Children's Social Care.

The Family Help approach has the potential to resolve two crucial issues in the current children's social care system. First, the way 'early help' is provided. At the moment, the way early help is delivered, doesn't work well. Early help is non-statutory, there is no national data collection of what early help is provided, and funding is often uncertain and short term. Action for Children research based on a Freedom of Information request to all local authorities in England found that the rates of early help varied from 1 in 6 children to 1 in 150 in other local authorities.¹ Second, too many children don't get the support they need even when they are categorised as 'in need'.

We do have some minor concerns about the single family help service approach. One issue is that the current strategy is unclear on what the implications would be for the existing formal early help system. For instance, whether early help assessments would continue or whether there would still be targeted early help, outside of statutory services?

Another issue is potential unintended consequences of implementing a family help model. Namely, in an under resourced system, we think there is a possibility that a lead practitioner model could cause family support workers and other non-social-work professionals to spend too much time away from frontline practice, as time would be taken up in the multi-agency coordination process. It would be counterproductive, in the long term, if the existing preventative system is used predominantly to plug gaps in support children at the Section 17 threshold and above. As a large provider of family support and allied services across the four nations of the United Kingdom, we are keen to work with government to inform and test models of interaction between family help caseholders and social workers. Our hope is that the current focus on family help is supported by a complementary focus on ensuring that local authorities are resourced to provide universal children's services that underpin local authority children's social care.

10. Looking at the features of early help listed below, in your opinion or experience, what are the top 3 features that make it a supportive service for families?

- The service is designed together with the input of children and families.
- Early help is delivered by the voluntary and community sector as well as the local authority and their partners (police and health).
- Having people with the right knowledge and skills available to help when needed.

¹ Action for Children, (2022) [Too Little Too Late Report Final.pdf \(actionforchildren.org.uk\)](https://www.actionforchildren.org.uk/wp-content/uploads/2022/03/Too-Little-Too-Late-Report-Final.pdf)



Why should VCOs be involved in delivering early help?

Action for Children runs more than 400 services for children and families across all four countries of the UK. Across this portfolio of services, we see many benefits that voluntary and community sector organisations of all sizes can play in the wider system. Chief among these is the relationships that organisations like our own are able to build with families. In our experience, families are less likely to see charity support as a gateway to statutory interventions, and as such, working with charities has less of a stigma attached, enabling genuine cooperation and trust between professionals and the families they support. In other words, VCOs complement statutory services by being able to reach and engage those families that are less likely to engage with services. This is often due the fact that staff employed by organisations such as our own come from the communities they serve, and Action for Children staff will frequently continue to support families before, during and after they are stepped up or down the windscreen of social care support. Thus, we see VCOs as critical to delivering the Care Review’s vision for a community-based and trusted family help system that provides seamless support from first contact.

Beyond this, larger VCOs such as Action for Children are able to access additional forms of support for families that local authorities find it harder to provide. An example of this is our Crisis Fund, that last year provided easy-to-access financial support to more than 126,700 children. The national approach we take also enables us to apply learnings across social care systems, whilst our safeguarding and financial oversight operations enables us to work closely with smaller community groups that experience a greater cultural barrier in accessing Local Authority funding and projects.

Why should early help be co-designed with children and families?

Co-designing services and children and families is the best way to buy-in and ensure that local offers meet the needs of the community. In our experience, the depth of engagement with families is variable, and in many localities, there is significant room for improvement.

Why do practitioners need the right skills and knowledge?

Family support works best when there is a team of trusted professionals with the right skills, including cultural or local knowledge, around the family. Families often describe receiving less support, or less helpful support, when stepped up to statutory interventions. It is a major strength of the proposed family help model that families will be able to access the same support even through step ups.

It’s our view that that is best supported by a system that is built on shared standards and approaches across local areas that make up a ‘minimum offer’. That approach enables national government to more effectively communicate about the role of family help, supports partners – like schools and health providers – to have a good understanding of the way the system works, and enables greater specialisation and learning between areas. Those are much harder to do well if local areas adopt very different approaches to delivering family help.

14. In your view, how can we make a success of embedding a “family first” culture?

Local authorities are more likely to have a genuine ‘family first’ culture when looking at placements for children if their approach to family help is focussed on supporting the whole family. Creating a system that puts a child’s family at the centre of approaches to improving that child’s welfare will



mean that professionals within a local authority are more inclined to work closely with wider family networks. In part, that is because working closely with children's families will help professionals build relationships with family members and to better incorporate their and their children's perspectives into planning support and – where necessary – placements.

15. In your view, what would be the most helpful forms of support that could be provided to a family network, in order to enable them to step in to provide care for a child?

First and foremost, family networks need adequate financial support to provide care for a child. This should at least match the fostering allowance, but it will also be important to recognise that many families providing care for children might not access to the same financial resources as approved foster carers. We are supportive of the plans to explore how local authorities can make flexible payments to family networks providing support through informal arrangements, or via a Special Guardianship Order or Child Arrangement Order.

In addition, in our experience, families will need to be able to access 24 hour emotional and practical support through the new family help offer. For example, the DECC service operated by Action for Children on behalf of Derbyshire County and Derby City Councils, and the local ICB, provides intensive therapeutic parenting support for children and carers, focused on transitions and step downs from residential to foster care, or to the birth family. Through this service and others like it, we see many cases where birth parents or extended family such as grandparents, are expected to provide support for children with very complex needs, despite working full time themselves, and often dealing with problems in their own life that they need help with. It will be important that the family networks that are caring for a child do not have to go through the front door referral process for social care support every time a need emerges, and local authorities are resourced to provide this on an ongoing basis, pre and post the placement being arranged. The Department for Education might wish to explore whether the Adoption Fund could be extended to kinship carers, or family networks. In particular, we identify a specific need for support around contact arrangements with the birth family, as unexpected visits and contact can be a significant source of strain on kinship placements, and a cause of breakdown.

17. To what extent are you supportive of the working definition of kinship care?

Somewhat supportive

18. Overall, to what extent do you agree that the 6 key missions are the right ones to address the challenges in the system?

Somewhat agree.

We agree with the missions. Mission 3 on corporate parenting has strong potential for impact. We address this in more detail in our answer to response to Q23.

19. To what extent do you agree or disagree that a care-experienced person would want to be able to form a lifelong legal bond with another person?

Agree

20. What would you see as the advantages or disadvantages of giving legal recognition to a lifelong bond?

The bonds that children and young people in the care system form with the adults that care for them are critical. As the Independent Review highlighted, these bonds often form lifelong and loving



networks of support and friendship for those with care experience and represent the very best of what our care system can deliver for young people. Prior to the question of whether legal recognition should be given to these relationships, the care system must be flexible enough to allow these bonds to form in a safe, permissible, and authentic way, and staff should feel empowered to develop meaningful relationships with the children in their care.

We see no reason that the option of legal recognition of these relationships shouldn't be explored further and made available for carers and care experienced people who choose it. For some care experienced people, providing this recognition will not only formalise the important relationships they have developed, but in the future could provide a critical legally recognised connection for important personal matters, such as interactions with immigration, healthcare, or justice systems. In developing these proposals further, government might also wish to explore whether these legal bonds can be formed with organisations as well as individuals who cared for children and young people.

21. What support is needed to set up and make a success of Regional Care Cooperatives?

The lack of supply of homes for children in care is a fundamental block to improving the way the whole system works and to improving outcomes for care experienced children and people. The vision for Regional Care Cooperatives is positive and the considerations outlined in the strategy are right. In the current system, too many children are let down by local authorities and aren't provided with a local, stable, loving home.

Regional Care Cooperatives will need ongoing support and oversight to ensure they are able to improve on the way local authorities are able to commission and provide homes for children in care. That should include ongoing capital support – building on the Children's Homes Capital Programme. Similarly, central government support on things like recruiting and retention of foster carers and building understanding of the children's homes workforce should be ongoing capabilities within the DfE.

Within one of the Pathfinders, we would encourage the government to include third sector partners within the care cooperative. Action for Children, for instance, has experience of delivering non-profit children's homes and fostering services across the country. We, and other voluntary sector providers, are eager and able to play a role in making the set-up of Regional Care Cooperatives a success.

In particular, we think it would be helpful to explore different types of relationships between local authorities and Regional Cooperatives within the pathfinders. For instance, the benefits of block booking placements in homes, of having long term relationships with providers, or of including local third sector partners in strategic decision making.

22. Do you have any additional suggestions on improving planning, commissioning and boosting the available number of places to live for children in care?

We strongly agree that there needs to be focussed national attention on providing homes for children with the most complex needs. Even at the regional level, solo placements, secure placements, and homes for children with severe mental health needs will often still only be small numbers, the demand is likely to be unpredictable, and the costs – even for regions – will be high. There should be an ongoing programme, led by central government, to ensure adequate supply of those complex placements.



23. Are there changes you think would be helpful to make to the existing corporate parenting principles?

The list of existing corporate parenting principles provides a good framework for supporting children in care and care leavers. Where we feel there is sometimes room for improvement is in the application of these principles by local authorities and their partners. In our practice, we see of lots of examples where children are denied support that would constitute good or normal parenting, from a lack of support with homework or job applications, to placing unnecessary barriers to them seeing friends or carrying out routine day to day activities like getting a haircut.

Thus, we feel that government should update the existing guidance on applying corporate parenting principles, to provide more specific instruction on what corporate parenting should look like in practice. One option for doing this would be to work with local authorities and Ofsted to develop a 'maturity model' for corporate parenting that local authorities can assess themselves against and use a framework for improving their corporate parenting offer. We feel this is likely be more actionable than current guidance, which largely provides high level definitions with discrete examples of good practice. But we also feel it would be sufficiently flexible local authorities to continue to innovate on their own corporate parenting role.

25. Do you have any further feedback on the proposals made in the 6 missions of this chapter?

No

26. Overall, to what extent do you agree that our proposals on the social worker workforce address the challenges in the system?

Disagree.

27. If you want the proposals to go further, what would be your top priority for longer term reform?

We welcome proposals to boost recruitment of new social workers, and the focus on attracting new people into the profession from outside of the usual routes. However, we would encourage government to set more ambitious targets than the 500 additional apprentices promised in the Implementation Strategy. Such a target constitutes less than 2% of the current workforce, and in our opinion, would not make a significant dent on vacancy rates, especially given the high turnover of early career social workers.

Feedback from social workers and allied professionals employed at Action for Children has highlighted some concerns with the proposed changes to the role of a social worker in the system. Namely we have some concern over the pipeline and retention of social workers eligible to become Child Protection Lead Practitioners. The pervasive staffing and recruitment issues for social workers are likely to lead to the cadre of more experienced staff working almost exclusively on stressful and high-risk child protection cases and do less of the rewarding work with families that attracts people to the profession in the first place. We felt this is likely to lead to significant burnout among this group and be a disincentive for earlier-career social workers to continue with their training. Ensuring that the Early Career Framework is matched by equivalent progression in pay and benefits might go some way to ameliorating the impact of this, and there may be some benefits from experimenting



with new models that allow experienced social workers to rotate away from child protection practice, to reduce the stress load and psychological impact of this work.

29. In your opinion, how can we ensure the delivery of reform is successful?

The most important change that the government can bring about will be funding. Figures from the Children's Services Funding Alliance show that £1.9bn per annum, or 50% of total spending has been lost from early intervention children's services in England since 2010-11. The bulk of these cuts have fallen on Tier 1 and 2 services, delivered through children's centres, that help manage the inflow of children needing more resource intensive targeted intervention and formed the community infrastructure that the Care Review envisions as the backbone of the whole social care system. Without investment in these type of services, there is a real danger that the elastic of the social care system will snap back to the status quo, and the reforms won't deliver transformational change it envisions.

We also encourage government to review and reform the legal framework under which Tier 1 and 2 'early help' services are delivered. The last 30 years have demonstrated that the existing flexible primary and secondary legislation around early help has not delivered a consistent quality service across the whole of England. Local authorities are often unable to consistently meet either their Section 17 Children Act 1989 duties, or the general duty to cooperate under Sections 10 and 11 of the 2004 Children Act. In our view, this reflects financially constrained local authorities being strongly incentivised to prioritise so called 'statutory' social care services at the expense of a longer-term vision for children and families, although even this phrasing suggests inequality in the ways that different local authority duties have been applied in practice. One option to address this would be to build on the family hub rollout and set clearer central expectations, through either primary or secondary legislation, on the levels of provision that should be made available to children and families before Section 17 involvement. As above, this would need to be backed with a financial package that enables local authorities to deliver on these new expectations and is sensitive to varying levels of need.

We also have concerns that the family help model, once rolled out following the Pathfinders, will deliver change-in-name-only unless the legal framework evolves to mandate the specific changes that the model requires, particularly around the constitution of 'family help teams', case holding responsibilities and minimum expectations of service delivery. More generally speaking, unless the balance of legal risks and responsibilities for local authorities is addressed, prevention will remain the poorer relative of protection.

Another policy area we would like to see much greater focus on in the future is family reunification for children leaving care. At least ¼ of children who left care in 2020-21, approximately 7000, went home to live with their families. But based on historical trajectories, more than 1500 of the children that went home in that year will already be back in care. We know there is patchy provision for birth families whilst their children are in care, and following reunification. Improving the rate of successful reunifications is not only the right thing to do for children and families but would help alleviate the financial and staffing pressures on the wider system. We would like see government trial the inclusion of specialist care transition workers within the family help offers being developed by the pathfinder local authorities and review and update guidance on family reunification to reflect evolving best practice.



Across the whole system, we would like to see government recognise the critical role that voluntary and community organisations (VCOs) play in delivering help for families. Action for Children runs more than 400 services for children and families across all four countries of the UK. Across this portfolio of services, we see many benefits that voluntary and community sector organisations of all sizes can play in the wider system. Chief among these is the relationships that organisations like our own are able to build with families. In our experience, families are less likely to see charity support as a gateway to statutory interventions, and as such, working with charities has less of a stigma attached, enabling genuine cooperation and trust between professionals and the families they support. In other words, VCOs complement statutory services by being able to reach and engage those families that are less likely to engage with services. This is often due the fact that staff employed by organisations such as our own come from the communities they serve, and Action for Children staff will frequently continue to support families before, during and after they are stepped up or down the windscreen of social care support. Thus, we see VCOs as critical to delivering the Care Review's vision for a community-based and trusted family help system that provides seamless support from first contact.

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Alongside investment and strengthening the legal framework, the other cornerstones of success will be reforming inspection and evaluation, and building a culture and workforce with the capacity and capability to deliver change.

On inspection and evaluation, the delivery of the new family help model would be supported by boosting the relative importance of early and family help provision within OFSTED's inspection framework and aligning it with the evaluation measures included in the new National Children's Social Care Outcomes Framework. Inspection plays a large role in setting culture across the whole sector.

On workforce, the success of family help will be driven by ensuring that family help professionals have the right skills and experience to meet the needs of families. There is a fine balance between ensuring that there is enough central direction to ensure that family help teams everywhere contain important forms of specific expertise (such as the proposed approach for SEND expertise) and ensuring that local authorities have enough leeway to adapt their offer in partnership with the community they serve. We think the right approach to this is to mirror the family hub rollout, and specify a set of minimum delivery expectations, backed by sufficient funding to deliver them in addition to a discretionary local offer. As one of the largest providers of family support work, and employers of family support workers, we look forward to working with government as it further develops for Practice Guides on family Support work and the accompanying Knowledge and Skills Statement.

Over and above all of this, central will be continuing to build infrastructure to listen to the wishes of children, young people and families. We are grateful and supportive of the steps the Department for Education has recently taken and continue to offer our support at Action for Children.